

Letter to Hon. Brian M. Cogan

February 17, 2022

Exhibit 4

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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STUART FORCE individually and as personal
representative of the ESTATE OF TAYLOR FORCE,
et al.,

Case No. 1:20-cv-2578-BMC

Plaintiffs,
-against-

QATAR CHARITY; QATAR NATIONAL BANK and
MASRAF AL RAYAN,

Defendants.

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**PROPOSED PLAINTIFFS' FIRST SET OF INTERROGATORIES TO
DEFENDANT [[BANK]] SEEKING JURISDICTIONAL DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Local Civil Rules 26.2-26.4, and the Court's order dated February ___, 2022, Plaintiffs, by their undersigned counsel, request that Defendant [[Bank]] answers the Interrogatories set forth below in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules, and serves such answers on Plaintiffs' counsel at the email addresses set forth below, as follows: answer to Interrogatory No. 1 to be served within 10 days following the receipt of service of these Interrogatories; and answers to Interrogatories Nos. 2-5 to be served within 30 days following the receipt of service of these Interrogatories.

DEFINITIONS

1. The Uniform Definitions in Discovery Requests set forth in Local Civil Rule 26.3, and the rules of construction set forth therein and in the Federal Rules of Civil Procedure, are all incorporated herein by reference.
2. The terms "You" and "Your" refer to Defendant [[Bank]].

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3. References to Defendant Qatar Charity include persons acting on behalf of, or under the direction or control, of Defendant Qatar Charity, and Defendant Qatar Charity operating under any other name including Nectar Trust.

4. The term “USD Account” means a financial account or subaccount that, during the Relevant Time Period, held deposits denominated in United States dollars, or from which Defendant Qatar Charity made payments that were received in United States dollars.

5. The “Relevant Time Period” means January 1, 2011 through and including December 23, 2016.

INTERROGATORIES

1. Identify all correspondent, nostro and vostro accounts, and any other type of account used to effectuate inter-bank transfers denominated in United States dollars, maintained for You by financial institutions in the United States during the Relevant Time Period. Each such account must be identified by the name of the financial institution and the address of the branch at which the account was maintained, the last 4 digits of the account number, the dates during which the account was maintained and the identity of Your principal contact person at each such financial institution concerning such accounts.

2. Identify all USD Accounts maintained by You for Qatar Charity during the Relevant Time Period. Each such account must be identified by the address of the branch at which the account was maintained, the type of account, the last 4 digits of the account number, the dates during which the account was maintained, and the identity of Your principal contact person at Qatar Charity concerning such accounts.

3. Identify all United States dollar payments received, or made, on behalf of Defendant Qatar Charity using each of the accounts identified in Your response to Interrogatory

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No. 1 during the Relevant Time Period, including all payments that involved the conversion of other currencies into United States dollars before reaching the ultimate beneficiary. Each such payment must be identified by date, amount, name of initiating party, name and address of initiating party's financial institution, name of beneficiary, and name and address of beneficiary's financial institution.

4. Describe any method other than the accounts identified in response to Interrogatory No. 1, by which You received or made inter-bank payments denominated in United States dollars on behalf of Your customers during the Relevant Time Period. Such description must identify any other financial institutions that facilitated such inter-bank payments (including the name and address of the financial institution).

5. Identify all United States dollar payments received, or made, on behalf of Defendant Qatar Charity using the methods described in Your response to Interrogatory No. 4 during the Relevant Time Period. Each such payment must be identified by date, amount, name of initiating party, name and address of initiating party's financial institution, name of beneficiary, and name and address of beneficiary's financial institution.

Dated: February ___, 2022

FLEISCHMAN BONNER & ROCCO LLP

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